

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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APR 12 1995

Joan M. Thomas, Treasurer D.C. Democratic State Committee 715 Varnum Street, NW Washington, DC 20011

Identification Number: C00295964

Reference: 30 Day Post-General Report (10/1/94-12/8/94)

Dear Ms. Thomas:

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This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 1994. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

The total listed on Line 6(c), Column B of the Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 6(c), Column B total.

-Please provide the Column B totals for the Detailed Summary Page.

-Your calculations for Line 31, Column A appear to be incorrect. FEC calculations disclose this amount to be \$26,655.88. Please provide the corrected total on the Detailed Summary Page.

-Schedule H3 for transfers from a non-faderal account for joint activity discloses \$17,443.79 in transfers, however a breakdown of the transfers received has not been provided. Please amend your Schedule H3 accordingly.

 Your report fails to disclose the federal and non-federal shares of administrative expense payments.

D.C. DEMOCRATIC STATE COMMITTEE PAGE 2

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A party committee must allocate between its federal and non-federal account all expenses for administrative costs, generic voter drives and fundraising programs or events. 11 CFR 106.6(b)(2)

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for a shared activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditure made on behalf of both federal and non-federal candidates (including in-kind contributions) must also be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR 106.1(a)

Please clarify the procedures you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

-Schedule H3 of your report discloses \$17,443.79 in transfers from your non-federal account for joint activity, however you have not filed a Schedule H4 disclosing the federal and non-federal shares of the allocable activity.

Further, Schedule B, supporting Line 29 indicates your federal account has paid 100% of the allocable expenses. This indicates a possible impermissible transfer of funds from your non-federal account to your federal account. You are advised that 11 CFR 102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 29 were made to influence the election

D.C. DEMOCRATIC STATE COMMITTEE PAGE 3

or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as in-kind contributions on Schedule B supporting Line 23. 11 CFR 104.3(b)(3)

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-Schedule F of your report discloses \$5,000 in coordinated party expenditures. Please be advised that your committee is qualified to make coordinated party expenditures only on behalf of federal candidates in the District of Columbia. All other expenditures should be disclosed as in-kind contributions on Schedule B supporting Line 23.

Further, Schedule F disclosed coordinated party expenditures made directly to a candidate committee (pertinent portions attached). Please be advised that a coordinated expenditure is to be made on behalf of a candidate for the General Election. The money cannot be contributed directly to the candidate committee. Please amend your report to clarify your expenditures and record them on the appropriate schedule supporting the correct line of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Reports Analyst

Reports Analysis Division

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SCHEDULE F

(TEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OF DESIGNATED AGENTS(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §4414(d))

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SCHEDULE F

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